



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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February 26, 2007

James Colter, P.E.
Remedial Project Manager (Code OPNEEV)
Facilities Engineering Command, Mid-Atlantic
Naval Facilities Engineering Command
9742 Maryland Avenue
Norfolk, VA 23511-3095

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Re: Fact Sheet Update Soil Cleanup at the Old Fire Fighting Training Area

Dear Mr. Colter:

EPA reviewed the draft Fact Sheet Update Soil Cleanup at the Old Fire Fighting Training Area, dated January 2007 for clarity and technical sufficiency. The June 2003 Fact Sheet on Soil Cleanup at the Old Fire Fighting Training Area and the September 2002 Feasibility Study were used in the review. Detailed comments are provided in Attachment A.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Old Fire Fighting Training Area. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kimberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Cornelia Mueller, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Ken Finkelstein, NOAA, Boston, MA
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 2, ¶1	The first sentence should be revised to improve clarity. Change “contains” to “contain.” The soil and fill contain remnant contaminants.
p. 2, ¶2	The volume of material previously proposed for removal (58,000 cy) is specified in this paragraph but the current proposed estimated volume (3,500 cy) under the scaled back soil removal is not specified. The fact sheet should better explain the rationale for the magnitude of the change and present both volumes.
p. 2	Text in the “Why Does the Navy Recommend this Plan?” related to risk is the same as it was in the 2003 fact sheet. The proposed action in 2003 was to remove 58,000 cy while the current proposed plan removes 3,500 cy. The phrase, “thereby ensuring long-term protection of human health and the environment” should be deleted.
p. 4	<p>The site history identifies “A design study was completed that mapped out the areas of soil exceeding concentrations deemed ‘hazardous.’” The Work Plan for the Soil Pre-Design Investigation (PDI) for OFFTA was completed in 2003 but the PDI was completed in 2004. The description in the site history of the design study does not match with the soil PDI objectives. Is the ‘design study’ the soil PDI? The use of the word “hazardous” in the site history text for the design study is problematic because the current removal is only for soil that is deemed “hazardous” but the definition of “hazardous” used in the design study is likely not the same.</p> <p>The date of the signed Action Memorandum for the second phase should be revised.</p>
p. 5	<p>The text under the clean up objectives regarding shellfish collection needs to be revised. The text states, “...Current state restrictions preventing shellfish collection...” It was mentioned during the November 2006 RPM meeting that limited shellfish collection is allowed at the site for certain populations. The word “preventing” needs to be changed. The text should clarify the state restrictions. It is unclear whether these restrictions (and their enforcement) are effective at minimizing shellfish collection.</p> <p>There are two bullets specifying objectives. The introductory sentence mentions three initial cleanup objectives. The introduction should be changed to identify two objectives.</p>